

REMARKS

Claims 23, 24, 28-31, 40, 43, 44., 46-48, 54, 56, 57, 59-61 and 67 have been amended for the purpose of clarifying what Applicants regard as the invention. No new matter has been added.

I. EXAMINER INTERVIEW

Applicants thank the Examiner for the courtesies extended during the telephonic interview on May 23, 2007 and June 21, 2007. In the May 23, 2007 telephonic interview, the 35 U.S.C. § 101 rejections to were discussed and possible amendments to overcome the current rejections were suggested. In the May 23, 2007 and June 21, 2007 telephonic interview, the Wu reference was discussed and possible amendments to overcome the current rejections were discussed.

II. CLAIM REJECTIONS-- 35 U.S.C. § 101

Claims 23-31, 38-41, and 43-55 stand rejected under 35 U.S.C. § 101. According to the Office Action, claims 23-31 and 38-41 are useful and concrete, but allegedly fail to produce a tangible result. Without acquiesce to the basis of the rejection, claim 23 has been amended to recite loading the at least one identified collection element into the computer-readable memory. Applicants respectfully submit that amended claim 23 and its dependent claims describe a method that clearly produces a tangible result, and therefore, satisfy § 101.

According to the Office Action, claims 43-55 recite a “machine readable medium” that may comprise “acoustic or light waves.” As discussed in the May 23, 2007 phone interview, Applicants note that paragraph 40 of the specification describes that a computer readable medium may be a **non-volatile medium, a volatile medium**, or a transmission medium (e.g., acoustic or light waves). To address the Examiner’s concern regarding the transmission medium, claim 43 has been amended

to clarify that the computer readable medium is a non-volatile medium or a volatile medium. As such, it is believed that claim 43 and its dependent claims satisfy § 101.

II. CLAIM REJECTIONS-- 35 U.S.C. § 102

Claims 23-68 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Publication No. 2004/0066529 issued to Wu (Wu). Applicants respectfully note that in order to sustain a claim rejection under § 102, each of the claim elements must be found, either expressly or inherently, in the cited reference.

A. For claim 23, there are one or more claimed limitations that are not disclosed, taught or suggested by the cited references.

1. Amended claim 23 recites “identifying a collection partition associated with the at least one identified collection element, wherein the **collection partition** comprises a **subset of collection elements in the document** and the **at least one identified collection element ...loading the collection partition .”** Claims 43 and 56 recite similar limitations. Applicants respectfully submit that Wu discloses acquisition of content data an element at a time and does not disclose **loading the collection partition, the collection partition** comprises a **subset of collection elements in the document and the at least one identified collection element.**

According to the Office Action, paragraph [0100-0103] of Wu disclose “loading the at least one identified collection element into the computer-readable memory based on a result from the act of determining, wherein the at least one identified collection element is loaded into the computer-readable memory when the at least one identified collection element is not within a collection partition in the computer-readable memory.” Applicants respectfully submit that Wu discloses acquisition of content data an element at a time and does not disclose **loading the collection**

partition, the **collection partition** comprising a **subset of collection elements in the document and** the at least one **identified collection element**.

Wu is directed toward handling the printing of a document when the requested data is acquired at different times from servers over the internet(Wu, page 1, [0010]). Specifically, Wu discloses loading and unloading data from RAM at the level of granularity of document elements (Wu, page 8, [0100]). Wu is silent with respect to loading more than one element at a time into RAM, much less loading a **subset of collection elements in the document and** the at least one **identified collection element**. In contrast, the focus of Wu is handling the problem of receiving document elements one at a time that are required for a print operation. Thus, Wu discloses acquisition of content data an element at a time, and does not disclose **loading** the collection partition, the **collection partition** comprising a **subset of collection elements in the document and** the at least one **identified collection element**.

2. Amended claim 23 recites “the one or more **collection elements** are **designated to be part of** the **collection** with a **markup language**...wherein the collection partition comprises a **subset of collection elements** in the document... **executing** the document operation with the collection partition.” Claims 43 and 56 recite similar limitations. Applicants respectfully submit that Wu discloses **acquiring all display content data of the document elements** that will fit on a page in order to perform a print of the document, and Wu does not disclose **executing** the document operation with the collection partition, comprising a **subset of collection elements** in the document, and the one or more **collection elements** are **designated to be part of the collection with a markup language**.

According to the Office Action, paragraph [0100] of Wu allegedly discloses “receiving a document operation request, the document operation requiring one or more collection elements of the document to be in a computer readable memory...executing the document operation (e.g. print).” Applicants respectfully submit that Wu discloses printing a document when **all of the content data of the document elements** has been acquired and does not disclose **executing** the document operation with the collection partition, the collection partition comprises a **subset of collection elements** in the document and the one or more **collection elements** are **designated to be part of the collection** with a **markup language**.

Wu discloses that document data is analyzed and divided into pages based upon the size of the document elements. (Wu, page 3, [0047] and page 6, [0073]). As shown in Figure 7, to perform the printing, Wu discloses that a determination is made as to whether **all the display content data of the document elements** for the page has been acquired (S21) and the print is terminated if the display content data is not acquired. (Wu, page 6, [0074]). Specifically, Wu teaches reloading of content data for document elements if the content data has previously been unloaded in order to print the document. (Wu, page 8, [0100]).

Wu discloses **acquiring all display content data of the document elements** that will fit on a page in order to perform a print of the document. Wu is silent with respect to **collection elements, designated to be part of the collection with a markup language**. To the extent that the Examiner considers document elements of a page to be collection elements, the document elements for a page are chosen after analysis of the content elements and are not designated to be part of a collection with a markup language. Further, the execution of a document print is not possible with a subset of document elements in Wu because **all display content data of the document elements** for the page are necessary to perform the print of the document. Thus, Wu does not disclose **executing the**

document operation with the collection partition, comprising a **subset of collection elements** in the document, and the one or more **collection elements** are **designated to** be part of the **collection** with a **markup language**.

For at least these reasons, Applicants submit that Wu fail to anticipate every limitation of claim 23. Because claims 43 and 56 share each of the limitations of claim 23 discussed above, they are not anticipated by Wu. Furthermore, because claims 24-42, 44-55, and 57-68 depend from claims 23, 43, and 56, they also are not anticipated by Wu.

Applicants assert that, for at least the above reasons, Wu fails to anticipate Claims 23-68 of the present application. Accordingly, Applicants respectfully request that this rejection be withdrawn.

CONCLUSION

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

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Respectfully submitted,

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